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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

12 GALE SOSTEK; and HERB SOSTEK,
13 Plaintiff,
14 vs.
15 COUNTY OF SAN BERNARDINO;
16 SAMUEL FULLER; and DOES 2-10,
inclusive
Defendants

Case No. 5:23-cv-02236-MRA-MRW
Hon. Mónica Ramírez Almadani

JOINT STIPULATION FOR ORDER EXTENDING DISCOVERY DEADLINES

[Proposed] Order filed concurrently herewith

IT IS HEREBY STIPULATED AND REQUESTED by and between the parties hereto, through their attorneys of record, as follows:

WHEREAS, the parties conducted a mediation on October 22, 2024.

WHEREAS, the Plaintiffs are submitting a settlement demand that will be presented to the County of San Bernardino Board of Supervisors on November 19, 2024.

WHEREAS, the rebuttal expert disclosures are currently scheduled to be exchanged by October 28, 2024 and the expert discovery cut off is November 4, 2024 (See Doc. # 59).

1 WHEREAS, the parties wish to have their settlement demand presented to the
2 County Board for decision before incurring the additional substantial expenses
3 associated with retaining rebuttal experts and with taking the depositions of the
4 respective experts.

5 WHEREAS, in order to promote the prospects for success of settlement
6 discussions and limit unnecessary expense, particularly as to the rebuttal expert
7 retention and the expert depositions, the parties request that the pending controlling
8 dates set forth in the Court's Scheduling Order be continued by approximately two
9 weeks after the settlement demand has been presented to the County Board for
10 approval on November 19, 2024.

11 WHEREAS, there have been two prior requests for continuance or extension
12 regarding discovery.

13 WHEREAS, such request, if granted, would result in the following schedule:

15	EVENT	CURRENT	PROPOSED
16	Rebuttal Expert Disclosures:	10/28/24	11/29/24
17	Expert Discovery Cut Off:	11/4/24	12/06/24

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19 7. All other pre-trial and trial dates would remain in effect.
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5 IT IS SO STIPULATED AND REQUESTED.

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9 DATED: October 28, 2024

LAW OFFICES OF DALE K. GALIPO

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By /s/ Eric Valenzuela
Eric Valenzuela
Attorneys for Plaintiffs

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DATED: October 28, 2024

WESIERSKI & ZUREK LLP

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By /s/ Michelle R. Prescott
Michelle R. Prescott
Attorneys for Defendants